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9 Attorneys for defendants Terry F Zdun and Carol J. Zdun

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF OREGON**  
12 **EUGENE DIVISION**

13 **United States of America,**

14 **PLAINTIFF**  
15 **Vs.**

16  
17 **Terry F. Zdun; Carol J. Zdun; Gary**  
18 **Teddder, Trustee of the IRENE LACEY**  
19 **TRUST; Samuel Warner, Trustee of**  
20 **the IRENE LACEY TRUST; WELLS**  
21 **FARGO BANK, NA; LOAN CITY,**  
22 **Inc; MORTGAGE ELECTRONIC**  
23 **REGISTRATION SYSTEMS, Inc; and**  
24 **DOUGLAS COUNTY, OREGON,**

25 **DEFENDANTS.**  
26  
27  
28

**Case # cv-10-6307 HO**

**DEFENDANTS' NOTICE OF**  
**TERMINATION OF COUNSEL AND**  
**SUBSTITUTION OF ATTORNEY.**

**DEFENDANTS' NOTICE OF TERMINATION OF COUNSEL**

1 Defendants Terry F. and Carol J. Zdun (Zdun), hereby notify the court and the parties to  
2 this action through their respective counsels, of the termination of the representation of Zdun  
3 by counsels Peter Gibbons and William Koontz.

4  
5 2 This termination shall be effective upon service of this notice, due to irreconcilable  
6 differences arising between counsels and client with respect to prosecution of their defense in  
7 this action. The differences between counsel and client have reached the point where counsel  
8 believes it would be impossible to provide competent professional representation of client without  
9 conflict and contention between attorneys and clients, such that all cooperation between them  
10 would cease. Such discord between attorney and client would cause irreparable harm to the  
11 interests of the client, requiring immediate termination in order to mitigate any further harm to  
12 Zdun as a result of said irreconcilable differences.

13 3 Wherefore, Zdun has demanded, and counsel consents to this termination.

**DEFENDANTS' NOTICE OF SUBSTITUTION OF ATTORNEY**

14  
15 4 Counsel has advised Zdun of the complexity of the litigation at bar and the necessity of  
16 adequate and competent representation, as well as the potential for severe adverse consequences  
17 to Zdun's property and estate in the event of failure to vigorously defend this action. Zdun hereby  
18 acknowledges such advice of counsel and makes this substitution pro tem., pending retention of  
19 new counsel to represent Zdun.

20 **5 WHEREFORE**, notice is hereby given that Terry F. Zdun and Carol J. Zdun hereby  
21 substitute Terry F. Zdun, in propria persona and Carol J. Zdun, in propria persona, respectively  
22 as counsel of record in place of Peter Gibbons and William Koontz jointly, effective upon filing  
23 this notice with the court and service upon opposing counsel.

24  
25 Contact information for new counsel is as follows:

26 Terry F. and Carol J. Zdun  
27 600 Devils Knob Road  
28 Tiller, Oregon 97484  
541-8253700 Phone  
541-825 3827 Fax

1 I consent to the above termination and substitution:

2 Dated: Feb. 20, 2011

3   
Terry F. Zdun

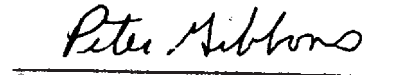
4 I consent to the above termination and substitution:

5 Dated: Feb. 20, 2011

6   
Carol J. Zdun

7 I consent to the above termination and substitution:

8 Dated: Feb. 21, 2011

9   
Peter Gibbons, Attorney at Law

10 I consent to the above termination and substitution:

11 Dated: Feb 21, <sup>2011</sup> 2011

12   
William Koontz, Esq.